

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

CONDITIONAL MAJOR DRAFT PERMIT No. F-04-012

LEGGETT PARTNERS, L. P.

WINCHESTER, KENTUCKY

AUGUST 14, 2002

ELAHE HOUSHMAND

PLANT I.D. #21-049-00051

APPLICATION LOG #54760

SOURCE DESCRIPTION:

Leggett Partners, located at Winchester, Kentucky, manufactures metal household furniture. The existing equipments at the site include: a two-stage washer, a dry off oven, a paint flow coater, a cure oven, a burn-off (Pyrolysis) oven, and a welding machine. All activities with the exception of the **Flow Coater** are insignificant activities.

The source has submitted an application for renewal of its current Title V Permit as a conditional major and the authorization to switch to a low-HAP coating for their **Flow Coater** that was installed in April 1990. The facility has also requested that enforceable limits be placed on their actual HAP emissions so that the company can be considered a conditional major for HAP.

EMISSION FACTORS

Material Safety Data Sheet, AP-42

APPLICABLE REGULATION

401 KAR 63:020. Potentially hazardous matter or toxic substances applies to all toxic air emissions.

401 KAR 60:005. Standards of Performance for new stationary sources incorporating by reference.

40 CFR 60, Subpart EE, Standards of Performance for Surface Coating of Metal Furniture (applicable to each affected facility commenced on or after November 28, 1980).

EMISSION AND OPERATING CAPS

40 CFR 60, Subpart EE, VOC emissions will be controlled within the constraints of regulation of 40 CFR 60, Subpart EE by controlling the formulation of paint used so that VOC content is less than 0.90 Kg per Liter of coating solids applied. The owner or operator shall submit a written report every calendar quarter of each instance in which the volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids is greater than 0.9 kilogram per liter of coating solids applied. If no such instances have occurred during a particular quarter, a report stating this shall be submitted semiannually.

HAP Conditional Major Limitation, Sourcewide emissions of any individual Hazardous Air Pollutant (HAP) shall not exceed 9 tons during any consecutive twelve (12) month period. The emissions of combined HAPs shall not exceed 22.5 tons per year. Monthly records which demonstrate compliance with these limitations, shall be maintained and total HAP emissions shall be reported semiannually.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.